

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANDREA TANTAROS,

Plaintiff,

- against -

FOX NEWS NETWORK, LLC, ROGER AILES, WILLIAM
SHINE, IRENA BRIGANTI, PETER A. SNYDER,
DISRUPTOR, INC., and JOHN DOES 1-50,

Defendants.
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17 Civ. 2958 (GBD)

**DECLARATION OF BENJAMIN M. ROSE IN SUPPORT OF MOTION BY
DEFENDANTS FOX NEWS NETWORK, LLC, WILLIAM SHINE AND IRENA
BRIGANTI FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 11(C)**

I, BENJAMIN M. ROSE, hereby declare that:

I am an attorney duly admitted to practice before this Court and am an associate of
Dechert LLP, 1095 Avenue of the Americas, New York, New York, counsel to Defendants Fox
News Network, LLC, William Shine and Irena Briganti in this case.

1. I submit this declaration to submit (a) declarations from witnesses with personal
knowledge; (b) certain correspondence between counsel in this matter; and (c) other relevant
documents in support of the Motion by Defendants Fox News Network, LLC, William Shine and
Irena Briganti for Sanctions Pursuant to Fed. R. Civ. P. 11(c). These other documents are mostly
reproductions or compilations of tweets from the Twitter account "DanielWayneBlo1," that have
been prepared by me or under my supervision, and other public information downloaded from
the Internet.

2. Attached hereto as Exhibit 1 is a true and correct copy of the declaration of Daniel
Wayne Block, dated April 26, 2017.

3. Attached hereto as Exhibit 2 is a true and correct copy of the February 15, 2017 hearing transcript in *Tantaros v. Fox News Network, LLC et al.*, Index No. 157054/2016, New York Supreme Court, as “so ordered” by Justice David Cohen.

4. Attached hereto as Exhibit 3 is a redacted copy of an email from Judd Bernstein to Barry Asen, Ronald Michael Green and Diane Brandi, dated May 4, 2016.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Declaration of Sarah Lyons in support of Defendants Fox New Network, LLC, William Shine and Irena Briganti motion for Rule 11 sanctions, dated May 22, 2017.

6. Attached hereto as Exhibit 5 is a redacted copy of an email from Judd Bernstein to Andrew Levander, dated March 3, 2017.

7. Attached hereto as Exhibit 6 is a true and correct copy of the complaint in *Tantaros v. Konst and Briganti*, Index No. 153637/2017, New York Supreme Court, filed April 19, 2017.

8. Attached hereto as Exhibit 7 is a true and correct copy of information concerning Daniel W. Block downloaded from the BeenVerified public website, www.beenverified.com.

9. Attached hereto as Exhibit 8 is a true and correct copy of information concerning Daniel W. Block downloaded from the official Alachua County Public Records website, <http://isol.alachuaclerk.org/RealEstate/SearchEntry.aspx>.

10. Attached hereto as Exhibit 9 is a compilation of tweets including elk images from the @DanielWayneBlo1 Twitter account.

11. Attached hereto as Exhibit 10 is a compilation of tweets including Disney images from the @DanielWayneBlo1 Twitter account.

12. Attached hereto as Exhibit 11 is a compilation of tweets including Blue Angels images from the @DanielWayneBlo1 Twitter account.

13. Attached hereto as Exhibit 12 is a compilation of tweets including Egyptian-related images from the @DanielWayneBlo1 Twitter account.

14. Attached hereto as Exhibit 13 is a compilation of tweets including bunny images from the @DanielWayneBlo1 Twitter account.

15. Attached hereto as Exhibit 14 are true and correct copies of May 19 and 31, 2016 tweets including Angel Oak in Charleston, S.C. images from the @DanielWayneBlo1 Twitter account.

16. Attached hereto as Exhibit 15 is a compilation of tweets including science fiction movie and television-related images from the @DanielWayneBlo1 Twitter account.

17. Attached hereto as Exhibit 16 is a compilation of tweets including lion images from the @DanielWayneBlo1 Twitter account.

18. Attached hereto as Exhibit 17 is a compilation of tweets including Andrea Tantaros-related images from the @DanielWayneBlo1 Twitter account.

19. Attached hereto as Exhibit 18 are true and correct copies of May 21 and May 22, 2016 tweets concerning a bookplate for Andrea Tantaros' book, *Tied Up in Knots*, from the @DanielWayneBlo1 Twitter account.

20. Attached hereto as Exhibit 19 is a redacted copy of information concerning Andrea Tantaros downloaded from the public Spokeo website, www.spokeo.com.

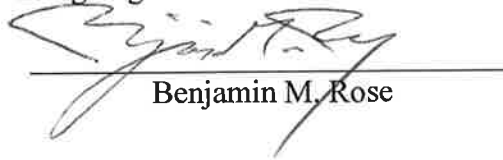
21. Attached hereto as Exhibit 20 is a true and correct copy of location information downloaded from the TweetDeck website, <https://tweetdeck.twitter.com/#>, concerning the jburststein05 Twitter account.

22. Attached hereto as Exhibit 21 is a true and correct copy of a letter to Judd Burstein from Andrew Levander, with redacted attachments, dated May 2, 2017.

23. Attached hereto as Exhibit 22 is a redacted copy of the Arbitration Clause from Andrea Tantaros' employment agreement with Fox News Network, LLC that Justice Cohen enforced when directing Tantaros' claims of sexual harassment and retaliation to arbitration.

I declare under penalty of perjury that the foregoing is true and accurate.

Dated: New York, New York
May 24, 2017



Benjamin M. Rose